

EXHIBIT “B”

From: [Thomas A. Bizzaro, Jr.](#)
To: [Gibbs, J. Evan](#); [Michael Mule](#); [Adler, Matt](#); [Gorman, Daniel E.](#)
Cc: [George Peters](#)
Subject: Re: SiteOne v. Giordano, et al.
Date: Thursday, June 19, 2025 9:43:59 AM

Evan -

Considering these are limited scope depositions, I do not believe it is necessary to do these in person. Virtual is fine.

But, to confirm, I would like to start with the Director/Head of SiteOne IT - not just an IT person who know about the litigation holds. I would like the head of the department. Please provide the name and title of that individual.

As far as scheduling, please provide the IT Head and Black's availability for depositions the week of June 30th.

Lastly, I can confirm that we would like to depose, Kevin Peattie, in person, at Millman Labuda's office, Kindly provide his availability the week of June 30th as well.

Thank you.

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From: Gibbs, J. Evan <Evan.Gibbs@troutman.com>

Sent: Monday, June 16, 2025 9:52 PM

To: Thomas A. Bizzaro, Jr. <tbizzaro@tab-law.com>

Cc: Michael Mule <michaelmule@mllaborlaw.com>; George Peters <gpeters@tab-law.com>

Subject: RE: SiteOne v. Giordano, et al.

Tom –

We're fine working with you to schedule these depositions. As we touched on at the hearing, Doug Black is in the Atlanta area and, because the company is HQ'd here, I

anticipate the IT representative will also be in the Atlanta area. Are you planning to take these two depositions remotely or in person? If in person, are you planning to come to Atlanta for the depositions? I ask because this will probably impact the scheduling of the depositions.

Thank you.

J. Evan Gibbs

Partner

troutman pepper locke

Direct: 404.885.3093 | Mobile: 229.425.3745

evan.gibbs@troutman.com

From: Thomas A. Bizzaro, Jr. <tbizzaro@tab-law.com>

Sent: Monday, June 16, 2025 1:49 PM

To: Gibbs, J. Evan <Evan.Gibbs@troutman.com>

Cc: Michael Mule <michaelmule@mlaborlaw.com>; George Peters <gpeters@tab-law.com>

Subject: SiteOne v. Giordano, et al.

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Evan -

We would like to move forward with scheduling the document retention depositions. I will speak with Mike M. and we will put together a complete list of the custodians we want to initially depose.

In the interim, would you kindly provide proposed dates for the depositions of a witness from the SiteOne IT department, who has knowledge of the litigation hold in this lawsuit, as well as Douglas Black. Since we know at this time we want to depose these two witnesses, let's move forward with scheduling those while we select the remaining. Thank you.

Best,

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Wednesday, July 16, 2025 at 12:53:20 PM Eastern Daylight Time

Subject: Re: SiteOne v. Narrow Way et. al. (Index No.: 616315/2024)
Date: Monday, June 30, 2025 at 1:36:35 PM Eastern Daylight Time
From: Thomas A. Bizzaro, Jr.
To: Gibbs, J. Evan, Gorman, Daniel E., Kent, Paris L., Michael Mule
CC: Adler, Matt, Mulry, Kevin P.
Attachments: image001.png

I can probably make 7.10 work. Mike Mule?

Thomas A. Bizzaro, Jr., Esq.



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—————

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From: Gibbs, J. Evan <Evan.Gibbs@troutman.com>
Date: Monday, June 30, 2025 at 11:00 AM
To: Thomas A. Bizzaro, Jr. <tbizzaro@tab-law.com>, Gorman, Daniel E. <Daniel.Gorman@troutman.com>, Kent, Paris L. <Paris.Kent@troutman.com>, Michael Mule <MichaelMule@mllaborlaw.com>
Cc: Adler, Matt <Matt.Adler@troutman.com>, Mulry, Kevin P. <kmulry@FarrellFritz.com>
Subject: RE: SiteOne v. Narrow Way et. al. (Index No.: 616315/2024)

Tom –

On the depositions, I'm hoping to have confirmation today for Doug Black for July 11. He/his team have been traveling. Does the afternoon of July 10 work for you for David Black's remote deposition?

I will follow up with you shortly on the availability of Kevin Peattie and Gerard Passaro.

Thank you.

J. Evan Gibbs

Partner

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evan.gibbs@troutman.com

From: Thomas A. Bizzaro, Jr. <tbizzaro@tab-law.com>

Sent: Monday, June 30, 2025 10:53 AM

To: Gorman, Daniel E. <Daniel.Gorman@troutman.com>; Kent, Paris L. <Paris.Kent@troutman.com>; Michael Mule <michaelmule@mlaborlaw.com>

Cc: Adler, Matt <Matt.Adler@troutman.com>; Gibbs, J. Evan <Evan.Gibbs@troutman.com>; Mulry, Kevin P. <kmulry@farrellfritz.com>

Subject: Re: SiteOne v. Narrow Way et. al. (Index No.: 616315/2024)

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Hi Dan-

Apologies for the delay. I hope you and your family are safe and out of Israel.

I've had three different sets of motion papers on unrelated matters that were due over the last week and a half. The final set is due by midnight tomorrow.

I don't necessarily believe there is a need to discuss as we may not have an issue with what you propose.

Let me take a look at it in a short while and I will get back to you with our comments.

Evan,

On another note, when do you expect to be able to confirm Doug Black's document retention depositions for the afternoon of July 11, 2025?

Additionally, when are Peattie and Passaro available for their respective depositions? Once these are scheduled and confirmed, we can provide the names of the other custodians we would like to depose. Magistrate Locke's order says 7.15.2025 for completion of the custodians' depositions.

Lastly, based upon your representations, my clients agree to start with the deposition of David Black, as opposed to the head of IT. Of course, My clients reserve their rights for an additional deposition of an IT witness should Mr. Black not have sufficient information.

We can also discuss this in the afternoon if needed. Thanks all.

Best,

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From: Gorman, Daniel E. <Daniel.Gorman@troutman.com>

Sent: Monday, June 30, 2025 10:43 AM

To: Kent, Paris L. <Paris.Kent@troutman.com>; Thomas A. Bizzaro, Jr. <tbizzaro@tab-law.com>; Michael Mule <michaelmule@mllaborlaw.com>

Cc: Adler, Matt <Matt.Adler@troutman.com>; Gibbs, J. Evan <Evan.Gibbs@troutman.com>; Mulry, Kevin P. <kmulry@farrellfritz.com>

Subject: RE: SiteOne v. Narrow Way et. al. (Index No.: 616315/2024)

Tom –

We need to get this squared away. Please let me know your availability to speak today or tomorrow.

Thanks,

Dan

Daniel E. Gorman*

Partner

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From: Gorman, Daniel E.

Sent: Wednesday, June 25, 2025 9:41 AM

To: Kent, Paris L. <Paris.Kent@troutman.com>; Thomas A. Bizzaro, Jr. <tbizzaro@tab-law.com>; Michael Mule <michaelmule@mllaborlaw.com>

Cc: Adler, Matt <Matt.Adler@Troutman.com>; Gibbs, J. Evan <Evan.Gibbs@troutman.com>; Mulry, Kevin P. <kmulry@farrellfritz.com>
Subject: RE: SiteOne v. Narrow Way et. al. (Index No.: 616315/2024)

Hi Tom and Mike –

I hope all is well. We sent you this draft compliance conference order on 6/6 and need to get it on file. Please confirm we can /s/ on your behalf.

Thanks so much,
Dan

Daniel E. Gorman*
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*Licensed to practice law in New York and New Jersey.

From: Kent, Paris L. <Paris.Kent@troutman.com>
Sent: Tuesday, June 24, 2025 1:24 PM
To: Thomas A. Bizzaro, Jr. <tbizzaro@tab-law.com>; Michael Mule <michaelmule@mllaborlaw.com>
Cc: Adler, Matt <Matt.Adler@troutman.com>; Gibbs, J. Evan <Evan.Gibbs@troutman.com>; Gorman, Daniel E. <Daniel.Gorman@troutman.com>; Mulry, Kevin P. <kmulry@farrellfritz.com>
Subject: RE: SiteOne v. Narrow Way et. al. (Index No.: 616315/2024)

Tom and Mike,

We'd like to get the compliance conference order on file this week. Please confirm whether we may execute on your behalf and file.

Thank you,

Paris Kent
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From: Kent, Paris L.
Sent: Monday, June 23, 2025 3:44 PM
To: Thomas A. Bizzaro, Jr. <tbizzaro@tab-law.com>; Michael Mule <michaelmule@mllaborlaw.com>
Cc: Adler, Matt <Matt.Adler@Troutman.com>; Gibbs, J. Evan <Evan.Gibbs@troutman.com>; Gorman, Daniel E. <Daniel.Gorman@troutman.com>; Mulry, Kevin P. <kmulry@farrellfritz.com>
Subject: RE: SiteOne v. Narrow Way et. al. (Index No.: 616315/2024)

Tom and Mike,

Following up again on the draft compliance conference order I sent on June 6th. Please let us know if you have any comments or if we may execute on your behalf and file.

Thanks,

Paris Kent

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From: Thomas A. Bizzaro, Jr. <tbizzaro@tab-law.com>

Sent: Tuesday, June 17, 2025 6:16 PM

To: Kent, Paris L. <Paris.Kent@troutman.com>; Michael Mule <michaelmule@mllaborlaw.com>

Cc: Adler, Matt <Matt.Adler@troutman.com>; Gibbs, J. Evan <Evan.Gibbs@troutman.com>; Gorman, Daniel E. <Daniel.Gorman@troutman.com>; Mulry, Kevin P. <kmulry@farrellfritz.com>

Subject: Re: SiteOne v. Narrow Way et. al. (Index No.: 616315/2024)

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I will review and get this back to you tomorrow morning. I have been in depositions all day. Thank you.

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From: Kent, Paris L. <Paris.Kent@troutman.com>

Sent: Tuesday, June 17, 2025 5:58 PM

To: Thomas A. Bizzaro, Jr. <tbizzaro@tab-law.com>; Michael Mule <michaelmule@mllaborlaw.com>

Cc: Adler, Matt <Matt.Adler@troutman.com>; Gibbs, J. Evan <Evan.Gibbs@troutman.com>;

Gorman, Daniel E. <Daniel.Gorman@troutman.com>; Mulry, Kevin P. <kmulry@farrellfritz.com>

Subject: RE: SiteOne v. Narrow Way et. al. (Index No.: 616315/2024)

Tom and Mike,

I am writing to follow up on the below and attached. Please let us know if you have comments regarding the compliance conference order, which substantively mirrors the preliminary

conference order, or if we have permission to sign on your behalf and file.

Thanks,

Paris Kent

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From: Kent, Paris L.

Sent: Wednesday, June 11, 2025 5:03 PM

To: Thomas A. Bizzaro, Jr. <tbizzaro@tab-law.com>; Michael Mule <michaelmule@mlaborlaw.com>

Cc: Adler, Matt <Matt.Adler@Troutman.com>; Gibbs, J. Evan <Evan.Gibbs@troutman.com>; Mulry, Kevin P. <kmulry@farrellfritz.com>; Gorman, Daniel E. <Daniel.Gorman@troutman.com>

Subject: RE: SiteOne v. Narrow Way et. al. (Index No.: 616315/2024)

Tom and Mike,

Following up on the below and attached. As explained, the attached largely mirrors the preliminary conference order, including the "Defendants' Claims/Defenses" section. The dates and attorney information have been revised. Please let us know if you have comments, or if we have permission to sign on your behalf and file.

Thanks,

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From: Kent, Paris L.

Sent: Friday, June 6, 2025 2:15 PM

To: Thomas A. Bizzaro, Jr. <tbizzaro@tab-law.com>; Michael Mule <michaelmule@mlaborlaw.com>

Cc: Adler, Matt <Matt.Adler@Troutman.com>; Gibbs, J. Evan <Evan.Gibbs@troutman.com>; Mulry, Kevin P. <kmulry@farrellfritz.com>; Gorman, Daniel E. <Daniel.Gorman@troutman.com>

Subject: SiteOne v. Narrow Way et. al. (Index No.: 616315/2024)

Tom and Mike,

Please see attached a draft compliance conference order. The substantive information was pulled from the preliminary conference order, including the "Defendants' Claims/Defenses" section. Only the dates and attorney information have been revised. Please let us know if you have comments, or if we have permission to sign on your behalf and file.

Thanks,

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